

BEFORE THE ADMINISTRATIVE HEARING COMMISSION
STATE OF MISSOURI

FILED
JAN 03²⁵ 2007
ADMINISTRATIVE HEARING
COMMISSION

W. DALE FINKE, Director,
Missouri Department of Insurance,
Financial Institutions and Professional
Registration,

Petitioner,

v.

MICHAEL G. GRIMES,

Respondent.

Case No.: 06-1352 DI

06051222120

PETITIONER'S MOTION FOR LEAVE TO AMEND COMPLAINT

Petitioner, W. Dale Finke, director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, through counsel, and pursuant to 1 CSR 15-3.350 hereby moves for leave to amend Petitioner's Complaint. In support thereof, Petitioner states as follows:

1. Petitioner filed a Complaint on September 11, 2006, with the Administrative Hearing Commission alleging that sufficient cause exists for disciplining Respondent's insurance producer license.

2. Respondent, through counsel, filed an answer on or about October 6, 2006 with the Administrative Hearing Commission.

3. Petitioner has determined that there are additional grounds for cause to discipline Respondent's license that were not pleaded in the Complaint filed on September 11, 2006. (See new Counts III and IV attached hereto as Exhibit A).

4. Petitioner hereby requests that the Commission deem Petitioner's First Amended

Complaint as filed in this case.

5. This motion is made in the interest of justice and not with the intent to hinder these proceedings in any manner.

WHEREFORE, Petitioner respectfully requests that this Commission grant Petitioner's Motion for Leave to Amend.

Respectfully submitted,

A handwritten signature in cursive script, reading "Tamara A. Wallace", is written over a horizontal line.

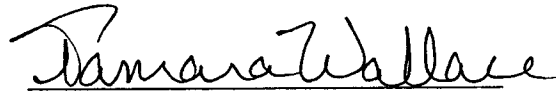
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ATTORNEY FOR PETITIONER
W. Dale Finke, Director
Missouri Department of Insurance, Financial
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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the foregoing was mailed first class, with sufficient postage attached, via the United States Postal Service on this 3rd day of January, 2007, to:

Steven W. Koslovsky
Attorney for Respondent, Michael G. Grimes
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Tamar Wallace